

ORIGINAL **SEALED**
BY ORDER OF THE COURT

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District of Hawaii

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UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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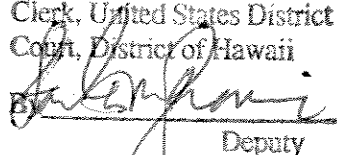
Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
WILLIAM NELSON, -BW (01))
a/k/a "Bula Grace,")
EDWARD ALAMEDA, -BW (02))
DANALEEN MOSES, PS (03))
JAMES CAMINOS, -PS (04))
ERICK DePONTE, JR. -PS (05))
SIDNEY SMITH, -PS (06))
ANTHONY SEAN MONFORTE, -PS (07))
FRED SIMEONOFF, -PS (08))
)
Defendants.)
)

CR. NO. **CR 02 00022 DAE**
INDICTMENT

[18 U.S.C. § 2;
18 U.S.C. § 371;
18 U.S.C. § 471;
18 U.S.C. § 472;
18 U.S.C. § 473]

ATTEST: A True Copy
WALTER A. Y. H. CHINN
Clerk, United States District
Court, District of Hawaii

Deputy

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I N D I C T M E N T

The Grand Jury charges that:

COUNT 1

From a precise date unknown to the grand jury, but by June 29, 2001, and continuing through in or about August, 2001, in the District of Hawaii, Defendants WILLIAM NELSON, also known as "Bula Grace," and DANALEEN MOSES, did knowingly conspire with each other and others both known and unknown to the grand jury to commit an offense against the United States, that is, to falsely make and counterfeit obligations of the United States, with intent to defraud, in violation of 18 U.S.C. § 471.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, Defendants WILLIAM NELSON, also known as "Bula Grace," and DANALEEN MOSES committed overt acts in the District of Hawaii, including, but not limited to, the following:

1. On June 29, 2001, DANALEEN MOSES purchased an HP OfficeJet printer/scanner/copier/fax machine from COSTCO, along with supplies for the HP OfficeJet.

2. Between on or about June 29, 2001 and July 21, 2001, WILLIAM NELSON, also known as "Bula Grace," and DANALEEN MOSES used the HP OfficeJet to make counterfeit \$50 and \$20 Federal Reserve Notes.

3. In or about July of 2001, WILLIAM NELSON, also known as "Bula Grace," used approximately \$9,000 in counterfeit United States currency to purchase illegal drugs.

4. In or about July of 2001, WILLIAM NELSON, also known as "Bula Grace," gave approximately \$250 in counterfeit United States Currency to M.V., which M.V. used to purchase goods from various businesses on the Big Island.

5. On or about July 21, 2001, WILLIAM NELSON, also known as "Bula Grace," gave Anthony Sean Monforte approximately \$1,090 in counterfeit United States currency for use in renting a big-screen television and video cassette recorder from Canyon Rent To Own on the Big Island.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

Between on or about June 29, 2001, and in or about August, 2001, in the District of Hawaii, Defendants WILLIAM NELSON, also known as "Bula Grace," and DANALEEN MOSES, with intent to defraud, did falsely make and counterfeit obligations of the United States, namely, counterfeit Federal Reserve Notes in various denominations.

All in violation of Title 18, United States Code, Sections 471 and 2.

COUNT 3

In or about July of 2001, in the District of Hawaii, Defendants WILLIAM NELSON, also known as "Bula Grace," and JAMES CAMINOS, with intent to defraud, did pass, utter, and publish falsely made and counterfeited obligation of the United States, namely, approximately \$9,000 in counterfeited Federal Reserve Notes, which Defendants used to purchase illegal drugs from Erick DePonte, Jr., with the Defendants then and there knowing said obligations were falsely made and counterfeited.

All in violation of Title 18, United States Code, Sections 472 and 2.

COUNT 4

In or about July of 2001, in the District of Hawaii, Defendant WILLIAM NELSON, also known as "Bula Grace," did knowingly transfer and deliver to James Caminos, false and counterfeited obligations of the United States, namely, more than \$4,000 in counterfeited Federal Reserve Notes, with the intent that these counterfeited Federal Reserve Notes be passed, published, and used as true and genuine.

All in violation of Title 18, United States Code, Section 473.

COUNT 5

In or about July of 2001, in the District of Hawaii, Defendant JAMES CAMINOS did knowingly receive from WILLIAM NELSON, also known as "Bula Grace," false and counterfeited obligations of the United States, namely, more than \$4,000 in counterfeited Federal Reserve Notes, with the intent that these counterfeited Federal Reserve Notes be passed, published, and used as true and genuine.

All in violation of Title 18, United States Code, Section 473.

COUNT 6

In or about July of 2001, in the District of Hawaii, Defendant ERICK DePONTE, JR. did knowingly transfer and deliver to Edward Alameda, false and counterfeited obligations of the United States, namely, counterfeited Federal Reserve Notes, with the intent that these counterfeited Federal Reserve Notes be passed, published, and used as true and genuine.

All in violation of Title 18, United States Code, Section 473.

COUNT 7

In or about July of 2001, in the District of Hawaii, Defendant EDWARD ALAMEDA did knowingly receive from Erick DePonte, Jr., false and counterfeited obligations of the United States, namely, counterfeited Federal Reserve Notes, with the

intent that these counterfeited Federal Reserve Notes be passed, published, and used as true and genuine.

All in violation of Title 18, United States Code, Section 473.

COUNT 8

On or about July 9, 2001, in the District of Hawaii, Defendant EDWARD ALAMEDA, with intent to defraud, did pass, utter and publish, a falsely made and counterfeited obligation of the United States, namely, a counterfeited \$50 Federal Reserve Note at a Union 76 gas station in Hilo, with the Defendant then and there knowing said obligation was falsely made and counterfeited.

All in violation of Title 18, United States Code, Sections 472.

COUNT 9

On or about July 9, 2001, in the District of Hawaii, Defendant EDWARD ALAMEDA did knowingly transfer and deliver to D.P., a false and counterfeited obligations of the United States, namely, a counterfeited \$50 Federal Reserve Note, with the intent that this counterfeited Federal Reserve Note be passed, published, and used as true and genuine.

All in violation of Title 18, United States Code, Section 473.

COUNT 10

On or about July 11, 2001, in the District of Hawaii, Defendant EDWARD ALAMEDA, with intent to defraud, did pass, utter and publish, a falsely made and counterfeited obligation of the United States, namely, a counterfeited \$20 Federal Reserve Note at a Sack and Save store in Hilo, with the Defendant then and there knowing said obligation was falsely made and counterfeited.

All in violation of Title 18, United States Code, Sections 472.

COUNT 11

In or about July of 2001, in the District of Hawaii, Defendant EDWARD ALAMEDA did knowingly transfer and deliver to Sidney Smith, false and counterfeited obligations of the United States, namely, counterfeited Federal Reserve Notes, with the intent that these counterfeited Federal Reserve Notes be passed, published, and used as true and genuine.

All in violation of Title 18, United States Code, Section 473.

COUNT 12

In or about July of 2001, in the District of Hawaii, Defendant SIDNEY SMITH did knowingly receive from Edward Alameda, false and counterfeited obligations of the United States, namely, counterfeited Federal Reserve Notes, with the intent that these

counterfeited Federal Reserve Notes be passed, published, and used as true and genuine.

All in violation of Title 18, United States Code, Section 473.

COUNT 13

On or about July 12, 2001, in the District of Hawaii, Defendant SIDNEY SMITH, with intent to defraud, did pass, utter and publish, falsely made and counterfeited obligations of the United States, namely, \$500 in counterfeited Federal Reserve Notes at a 7-Eleven store in Hilo, with the Defendant then and there knowing said obligations were falsely made and counterfeited.

All in violation of Title 18, United States Code, Sections 472.

COUNT 14

On or about July 21, 2001, in the District of Hawaii, Defendants WILLIAM NELSON, also known as "Bula Grace," ANTHONY SEAN MONFORTE, and FRED SIMEONOFF, with intent to defraud, did pass, utter, and publish, and attempt to pass, utter, and publish, falsely made and counterfeited obligations of the United States, namely, approximately \$1,090 in counterfeited Federal Reserve Notes to Canyon Rent to Own in order to obtain a big screen television and a video cassette recorder, the Defendants

then and there knowing said obligations were falsely made and counterfeited.


All in violation of Title 18, United States Code, Sections 472.


DATED: January 17, 2002, at Honolulu, Hawaii.

A TRUE BILL

(151)
FOREPERSON, Grand Jury

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

for 
ELLIOT ENOKI
First Assistant U.S. Attorney


CRAIG H. NAKAMURA
Assistant U.S. Attorney

UNITED STATES v. WILLIAM NELSON, et al.; Cr. No. _____;
"INDICTMENT"